

EXHIBIT A

ORIGINAL
FILED IN OFFICE
4/14/2021 10:44 AM
Brenda Boone-Cove
CLERK OF STATE COURT
GLYNN COUNTY GEORGIA

IN THE STATE COURT OF GLYNN COUNTY
STATE OF GEORGIA

Joyce Buckson

PLAINTIFF

Vs.

NV LNWA JIC HOTEL, LLC, D/B/A Jekyll Island Club Resort

DEFENDANT

CIVIL ACTION CASE # CV20210108

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

NV LNWA JIC HOTEL, LLC, D/B/A Jekyll Island Club Resort

Defendant's Address

Cogency Global INC. Registered agent for defendant Roswell Lakes pkwy suite 310, Roswell, Ga 30076

You are hereby summoned and required to file with the Clerk of said Court and serve upon Plaintiff or Plaintiff's attorney whose name and address is:

Joyce Buckson

65 Melody Lane

Jesup, Ga 31545

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, Judgment by default will be taken against you for the relief demanded in the complaint.

This 14th day of April, 2021.

Brenda Boone-Cove, Clerk
Glynn County State Court

By: Dassiana Carlyle
Deputy Court Clerk, State Court

Served May 10, 2021
N. Hunter 442

REC'D IN REPLY 21 MAY 06 PM 12:03

IN THE STATE COURT OF GLYNN COUNTY


CLERK OF STATE COURT

STATE OF GEORGIA

JOYCE BUCKSON

PLAINTIFF,

CV20210108

V.

CIVIL ACTION NO: ~~CV20200151~~ XXXXXXXX

NV LNWA JIC HOTEL,LLC

D/BA/JEKYLL ISLAND CLUB RESORT

*DEFENDANT.*COMPLAINT FOR DAMAGES

(Premises liability -Ga. Code Ann., § 51-3-1---Damages)

COMES NOW, Joyce Buckson [hereinafter,"Buckson"], the plaintiff herein, states her complaint against the defendant as follows:

PARTIES

1.

Buckson is and was a resident of Wayne County, State of Georgia at all material times alleged herein.

2.

The defendant is NV LNWA JIC HOTEL, LLC, D/BA/ Jekyll Island Club Resort [hereinafter, "The Club].

Jurisdiction & Venue

3.

The Club is a Delaware corporation authorized to do business in the State of Georgia. **The Club** may be served by service upon its registered agent Cogenty Global Inc., at 900 Roswell Lakes Parkway, Suite 310, Roswell, Georgia 30076. The **Club** is therefore subject to jurisdiction of this court.

4.

At all times alleged herein, **The Club** either independently or jointly owned, operated, controlled and/or managed the premises and properties located at 371 Riverview Drive, Jekyll Island, Georgia 31527 within Glynn County, Georgia where the cause of action arose. Therefore, venue is proper in Glynn County.

FACTUAL ALLEGATIONS

5.

On or about October 4, 2018, approximately 2:00PM, **Buckson** was an invited and lawful guest upon the premises of **The Club** at 371 Riverview Drive, Jekyll Island, Georgia 31527.

6.

At the aforesaid time and place, while ascending stairs on the premises, **Buckson** slipped and fell causing serious, painfully excruciating and permanent injuries to her wrists, knees, neck, shoulder, back and hips. Medicare did not deny payments of any expenses incurred from the date of the injury October 4, 2018 and afterwards.

7.

At all times alleged herein, **Buckson** exercised that degree of reasonable care necessary to protect herself from all injury.

8.

At the aforesaid time and place, The premises did not accommodate handicap accessibility to use their bathroom facilities. The stairway was too steep to climb, in order to use bathroom facilities as directed by outside attendants that were on duty. The use of the luggage elevator to access bathroom facilities was denied. **The Club** knew or reasonably should have known the dangerous conditions on the premises.

9.

Despite the use of the textured rug, the wooden edge of the step was exposed

With an uneven, smooth, and slippery surface. Upon ascending the stairway, because of its steepness, height of steps, and texture of the wood, causing **Buckson** to fall. Noticeably, right side, cracked banister with slick handball surface. **The Club's** scheduled attendant on duty, **Buckson** seemed to recall a name, Harold, who witnessed **Buckson** lying on the stairway after the fall and asked if she was Okay on October 4, 2018. No caution signs were posted to alert the user of precautionary steps to take when using the stairs. The Club failed to warn of the hazard and did not comply with ADA standards.

10.

Incident process of reporting starting on October 5, 2018 with a personal contact with JoAnne Decesare/direct # (912)-635-5165. Made an incident report and she stated that it will be on file. Decesare said that she would forward the report to Gallagher Bassett for claim. There is a witness to this telephone call.

11.

Defendants First Request For Production Of Documents To Plaintiff

Page 6, paragraph 12, line 2. My niece's name was incorrect on a legal document. There was no **Grandy Woldridge**, but there is a **Brandy Woolridge**, who is my niece and was registered as a guest on the premises only. It was falsely concluded that I was not a visitor on the premises at the time of my injury, (October 4, 2018), based on the wrong name per the defendant. She was a registered guest on **The Club's** premises and I, **Buckson** did have a legal right to be on the premises as a visitor/niece's guest. There are no signs prohibiting visitors. There were no inquiries made or sign-in requests made by outside attendants when directed to use the bathroom. I, **Buckson**, would have never misspelled my niece's name on a recorded statement when her last name is also my maiden name, **Woolridge**. **Brandy Woolridge** never attended a lecture on the premises as the defendant alleged on a recorded statement and legal document. **Buckson** was on the premises with her brother, **Rev. Dr. Garrund Woolridge**, now deceased, a witness to her fall; to meet her niece and his daughter, **Brandy Woolridge** at the hotel. The defendant flawed the case through investigation of **Grandy Woldridge**.

12.

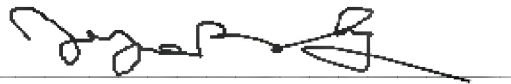
At the aforesaid time and place, **The Club** violated its duty to care owed to **Buckson**. As a direct and proximate result of the breach of **The Club** of the duty it owed to **Buckson**, she sustained damages, which she is entitled to recover from **The Club**.

Wherefore, **Buckson** demands the following relief:

- a) That the case be tried by a jury;
- b) That she recovers all special damages she is able to prove at trial;
- c) That she recovers all general damages she is able to prove at trial, including mental and physical pain and suffering;
- d) That she sustained damages, including medical bills, over \$100,000, to which she is entitled to recover from **The Club**;
- e) That she recovers all costs and attorney's fees for bringing this action; and
- f) For such other and further relief that the court deems just and proper.

This 13th day of April 2021.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Joyce Buckson', written over a horizontal line.

Joyce Buckson, Plaintiff

65 Melody Lane

Jesup, Georgia 31545

(912)-255-2301

mbuckson912@gmail.com